



June 5, 1980

John Rosenbaum, Esq.
Elyria City Prosecutor
City Hall
Broad Street
Elyria, OH 44035

Re: City of Elyria vs. Chemical Recovery
Systems, Inc. and James Freeman

Dear Mr. Rosenbaum:

I obtained service of the four summons prepared and filed by your office on June 4, 1980. I have also given some thought to your comment that this company and Mr. Freeman personally will be cited on a daily basis hereafter. You recognize, I am sure, the constitutional issues raised in my pleadings in the action filed in Common Pleas Court. I intend to pursue these grounds as well as the case on the merits vigorously. Please be advised that, by reason of the fact that all issues are now before the Common Pleas Court and Elyria Municipal Court, in the event criminal summonses are filed on a daily basis I will request an injunction against further prosecution in the Court of Common Pleas.

Very truly yours,

David C. Long

DCL/ams

cc:
Mr. James C. Freeman